

Message

From: Lovell, John [Lovell.John@epa.gov]
Sent: 10/14/2015 5:58:53 PM
To: Joe Ditty [jditty@msank.org]
CC: Linda French, Esquire [linda.french@hatchmott.com]; ldl@gllawyers.com; Ottinger, Elizabeth [Ottinger.Elizabeth@epa.gov]
Subject: RE: Grab sample results and Daily Maximum

When using grab samples to evaluate compliance with a daily maximum limit (as opposed to an instantaneous limit), you would average all separate grab sample results to obtain a single daily result. The time period doesn't need to be within the same calendar day, you can use a consecutive 24-hour period. This is consistent with collecting a 24-hour composite sample where you don't need to start the sampler at midnight whenever you are sampling.

So in your case, assuming that the cyanide limit is a daily maximum limit and not an instantaneous maximum limit, you would average the results from your 4 grab samples (as long as they are taken within a 24-hour period) and compare the one result to the daily maximum limit to determine compliance.

Let me know if you'd like to discuss further.

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From: Joe Ditty [mailto:jditty@msank.org]
Sent: Wednesday, October 14, 2015 1:44 PM
To: Lovell, John <Lovell.John@epa.gov>
Cc: Linda French, Esquire <linda.french@hatchmott.com>; ldl@gllawyers.com
Subject: Grab sample results and Daily Maximum

John:

I am enforcing for total cyanide at an SIU and I have been taking four (4) individual grab samples, which I have analyzed separately. I sample over 24 hours [two (2) days] and I am reporting each exceedence as a violation of the maximum total cyanide limit. I have been trying to determine if I am applying the maximum total cyanide limit correctly. I have these questions:

1. Does the 24 Hour time frame constitute a day, or should each calendar day's results be considered for the Maximum Limit?
2. Should the individual grab sample results be evaluated against the Maximum Limit?

Joe